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Federal Communications Commission  
Office of the Secretary

Before the

Federal Communications Commission  
Washington, D.C. 20554

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SEP 13 2004

Federal Communication Commission  
Bureau / Office

In the Matter of )

Amendment of Section 73.202(b), )  
Table of Allotments, FM Broadcast Stations )  
(Levan and Richfield, Utah) )

MB Docket No. 04-258  
RM-11000

To: Assistant Chief, Audio Division

**COMMENTS AND COUNTERPROPOSAL OF MID-UTAH RADIO, INC.**

Mid-Utah Radio, Inc. ("Mid-Utah"), licensee of Station KCYQ(FM), which operates on Channel 229C at Richfield, Utah, by its undersigned counsel and pursuant to §1.420 of the Commission's Rules, hereby files its Comments in the above captioned proceeding. Mid-Utah has previously demonstrated that flaws in the underlying petition for rulemaking filed by Micro Communications, Inc. ("Micro") create good cause for the Audio Division, Media Bureau (the "Division") to rescind the Notice of Proposed Rulemaking and Order to Show Cause ("NPRM") released July 20, 2004 in this proceeding<sup>1</sup>. However, should the Division not rescind the NPRM, Mid-Utah respectfully submits that instead of adopting Micro's proposal, the Division should adopt Mid-Utah's counterproposal more fully described below because it will advance higher FM assignment priorities than Micro's proposal. In support hereof, the following is shown:

<sup>1</sup> See "Opposition and Request for Expedited Rescission of Notice of Proposed Rulemaking and Order to Show Cause" filed by Mid-Utah in this proceeding on August 30, 2004. The NPRM required Mid-Utah to show cause, by August 30, 2004, why its construction permit for KCYQ should not be modified as proposed therein, and invited comments of interested parties to be filed on or before September 13, 2004.

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By way of background, on October 14, 2003, Micro, licensee of Station KCFM, operating on Channel 244C at Levan, Utah, petitioned the Division to substitute Channel 229C for Channel 244C at Levan, and substitute Channel 244C for Channel 229C at Richfield. In other words, Micro proposed that KCFM and KCYQ swap channels. At best, and according to Micro's own words, its proposed modification to the FM Table of Allotments would advance the Commission's fourth FM assignment priority.<sup>2</sup>

By contrast, and as further detailed in the attached Engineering Statement of Consulting Engineer, Kevin Terry, Mid-Utah proposes the allotment of Channel 231C to Boulder Town, Utah, as that community's first local aural service. At the same time, to eliminate short-spacing that Channel 231C would cause to KCYQ on Channel 229C at Richfield, Mid-Utah proposes to delete Channel 229C at Richfield, and allot Channel 229C to Mount Pleasant, Utah, as that community's first local service, with the concurrent modification of license of KCYQ to specify Mount Pleasant as its new community of license. Hence, Mid-Utah's counterproposal is mutually exclusive with Micro's proposal to allot Channel 229 to Levan, Utah. That Mid-Utah's counterproposal represents a preferred arrangement of the FM Table of Allotments to that proposed by Micro is clearly demonstrated in Mr. Terry's Engineering Statement.<sup>3</sup>

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<sup>2</sup> See Micro Petition for Rulemaking at ¶2.

<sup>3</sup> See *Revision of Assignment Policies and Procedures*, 90 FCC 2d 88, 91-92 (1982). The FM allotment priorities are: (1) First fulltime aural service; (2) Second fulltime aural service; (3) First local service; and (4) Other public interest matters.

Both Mount Pleasant (population 2,707) and Boulder Town (population 180)<sup>4</sup> qualify as communities for allotment purposes and both meet the Commission's definition of a community. Each has its own zipcode<sup>5</sup> and each provides numerous services to its residents. Mount Pleasant is self-governed by a town council; it has an airport, a hospital (Sanpete Valley Hospital), seven restaurants, an elementary school and a high school, four churches and four lodgings (inns and bed & breakfasts).<sup>6</sup>

According to information that undersigned counsel obtained from the Boulder Town Clerk, Ms. Judy Davis, Boulder Town<sup>7</sup> is self-governed by a mayor and town council. It has an elementary school, a library, a fire station, a church, three motels, three restaurants and a coffee shop, an RV park, two grocery stores/gas stations, and numerous other small businesses, including furniture makers, artists and an auto mechanic shop. Boulder Town also has a state park within its borders and its primary industry now is tourism, which is promoted by the Boulder Business Alliance on the worldwide web at [www.boulderutah.com](http://www.boulderutah.com). Thus, Boulder Town clearly qualifies as a community for allotment purposes.<sup>8</sup>

Should the Commission allot Channel 231 to Boulder Town, Mid-Utah hereby commits to vigorously pursue acquiring the channel through the FCC's auction

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<sup>4</sup> Population figures from 2000 U.S. Census.

<sup>5</sup> Boulder Town's zipcode is 84746. Mount Pleasant's zipcode is 84647.

<sup>6</sup> Information obtained from [www.onlineutah.com](http://www.onlineutah.com) and [www.ulct.org/mtppleasant](http://www.ulct.org/mtppleasant).

<sup>7</sup> According to Ms. Davis, although Boulder Town is the community's official name, it is also commonly called Boulder.

<sup>8</sup> See *Dillsboro and Rosman, North Carolina*, 15 FCC Rcd 25562 (2000).

procedures. If Mid-Utah should be the highest bidder, it commits to constructing and operating a new station on Channel 231C at Boulder Town.

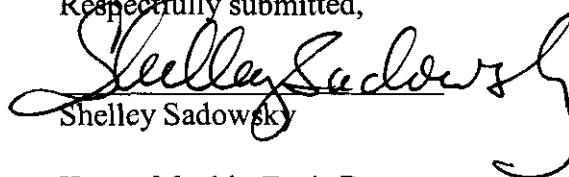
In sum, as more particularly demonstrated in the attached Engineering Statement, Mid-Utah's counterproposal will result in a preferential arrangement of Allotments under the Commission's Assignment Priorities One, Two and Three. Accordingly, the Division should adopt the following proposed changes to the FM Table of Allotments:

Community	Current	Proposed
Richfield, UT	229C	<sup>2</sup>
Boulder Town, UT	----	231C
Mount Pleasant, UT	---	229C
Levan, UT	244C	244C

Concurrently, the Commission should modify the license of Station KCYQ to change its community of license to Mount Pleasant.

WHEREFORE, for the reasons stated herein and in the attached Engineering Statement, the counterproposal of Mid-Utah should be adopted.

Respectfully submitted,



Shelley Sadowsky

Katten Muchin Zavis Rosenman  
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Washington, DC 20007-5201  
Tel: 202-625-3719

Counsel for Mid-Utah Radio, Inc.

Dated: September 13, 2004

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<sup>2</sup> As Richfield continues to be served by Station KSVC(AM) (also licensed to Mid-Utah), the community will continue to be well served by a local radio service.

**ENGINEERING STATEMENT**

**IN SUPPORT OF A  
COUNTERPROPOSAL**

**MB DOCKET 04-258  
RM 1100**

**Mid-Utah Radio, Inc.**  
KCYQ (FM) 229C Richfield, UT

Prepared by:

Kevin Terry  
Consulting Engineer  
2835 E 3300 S  
Salt Lake City, UT 84109  
(801) 412-6080

September 12, 2004

ENGINEERING STATEMENT  
IN SUPPORT OF A  
COUNTERPROPOSAL  
MB DOCKET 04-258  
RM 1100

Mid-Utah Radio, Inc.  
KCYQ (FM) 229C Richfield, UT

**General:**

I have been retained by Mid-Utah Radio, Inc. ("Mid-Utah"), licensee of radio station KCYQ (FM) Richfield, UT, to prepare the engineering portion of its Counterproposal in MB Docket 04-258, RM 1100.

In the original Petition for Rule Making in this proceeding, Micro Communications, Inc. ("Micro"), licensee of radio station KCFM (FM) Levan, UT, proposes to change its channel from 244C to 229C and move its site to coordinates 39-50-53.7 NL, 111-19-51.4 WL. In support of its Proposal, Micro states, "while no white or gray area is being created or eliminated, and no local service is being provided or withdrawn, the fourth priority<sup>1</sup> will be served by providing needed third reception service to a population of 328 and a fifth service to 1007."

Mid-Utah, in the instant Counterproposal, seeks to add first service at Boulder Town, UT, on channel 231C. In order to be fully spaced pursuant to Section 73.207, channel 229C must be deleted at Richfield, UT. This is the reserved channel for Mid-Utah's KCYQ. In order to allow channel 231C to be added at Boulder Town, Mid-Utah proposes to make a mutually exclusive community of license change, delete Channel 229C at Richfield, and add channel 229C at Mount Pleasant, UT, for KCYQ's use. Consequently, Mid-Utah's Counterproposal is mutually exclusive with Micro's Petition for Rule Making.

With respect to Micro's proposal, Mid-Utah contends that changing the allotment site and channel of KCFM to either the site specified by Micro or the site specified by the Commission in the Notice of Proposed Rule Making<sup>2</sup> would not be in the public interest. First, as the Commission has already discovered, it is extremely unlikely for KCFM to provide City-Grade service to its Community of License from Micro's Proposed Site. Second, the amount of White Area and Grey Area that would be created by the removal of KCFM 244C Levan, UT, from its licensed site outweighs the benefits gained at the site proposed by the Commission at Levan's Community Reference Coordinates.

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<sup>1</sup> Micro's engineer and counsel state that its proposal satisfies Priority Four under the Commission's assignment priorities. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 91-2 (1982).

<sup>2</sup> In the NPRM, the Commission determined that Micro's Proposed Site did not provide adequate City-Grade coverage of Levan, UT. Therefore, the Commission moved the allotment coordinates of the proposed channel to the Community Reference Coordinates of Levan at 39-33-31 NL, 111-51-40WL.

ENGINEERING STATEMENT  
IN SUPPORT OF A  
COUNTERPROPOSAL  
MB DOCKET 04-258  
RM 1100

Mid-Utah Radio, Inc.  
KCYQ (FM) 229C Richfield, UT

**Exhibits in Support of Counterproposal:**

Exhibit E, Figure 1 is an allocation study showing the spacings to other authorizations if channel 231C is allotted to Boulder Town, UT, as that community's first local aural service. The only shortspacings are to the licensed site of KCYQ 229C at Richfield, UT. In order for channel 231C to be added at Boulder Town, KCYQ proposes to change community of license from Richfield to Mount Pleasant on 229C.

Exhibit E, Figure 2 is an allocation study showing the spacings to other authorizations if channel 229C is allotted to Mount Pleasant, UT, as that community's first local aural service. The only shortspacings are to the construction permit of KCYQ (BPH-20030304AAQ) and to Micro's proposed allocation of channel 229C at Levan, UT. Hence, this Counterproposal is mutually exclusive with the allotment of channel 229C at Levan, UT. At the proposed allotment site, Mid-Utah has received "reasonable assurance" from the land owner that it will be allowed to construct a tower at that location if the Commission adopts the instant Counterproposal and subsequently grants a Construction Permit for KCYQ to operate at the site.

Exhibit E, Figure 3 shows the proposed city-grade contour for channel 231C from the instantly proposed Boulder Town, UT, allotment site. As can be demonstrated in that exhibit, since the proposed allotment coordinates are also located at the Community's reference coordinates, 100% of the City Limits of Boulder Town are encompassed by the Maximum Class C 70 dBu City-Grade Contour (67.7 kilometers from the proposed allotment site).

Exhibit E, Figure 4 shows the proposed city-grade contour for channel 229C (KCYQ) from the instantly proposed Mount Pleasant, allotment site. As can be demonstrated in that exhibit, 100% of the City Limits of Mount Pleasant are encompassed by the Maximum Class C 70 dBu City-Grade Contour (67.7 kilometers from the proposed allotment site).

Exhibit E, Figure 5 shows the “Gain Area” when KCYQ moves to Mount Pleasant, UT, on 229C. As can be shown, the addition of channel 229C at Mount Pleasant will:

- Provide First Aural Service to 12 people (eliminating White Area under Priority 1)
- Provide Second Aural Service to 1,270 people (eliminating Grey Area under Priority 2)
- Provide First Local Aural Service to 2,707 people (Priority 3)
- Provide New Service to 376,537 people

Exhibit E, Figure 6 shows the “Loss Area” when KCYQ 229C leaves Richfield, UT.<sup>3</sup> As can be shown, the deletion of channel 229C at Richfield will:

- Remove First Aural Service from 4 people (creating White Area under Priority 1)
- Remove Second Aural Service from 555 people (creating Grey Area under Priority 2)
- Remove Service from 44,084 people

Exhibit E, Figure 7 shows the proposed service “Gain Area” for 231C at Boulder Town. As can be shown, the addition of channel 231C at Boulder Town will:

- Provide First Aural Service to 755 people (eliminating White Area under Priority 1)
- Provide Second Aural Service to 1,465 people (eliminating Grey Area under Priority 2)
- Provide First Local Aural Service to 180 people (Priority 3)
- Provide New Service to 8,724 people

Exhibit E, Figure 8 shows the predicted coverage of KCFM from the allotment site coordinates that Micro proposed in its original Petition (39-50-53.7 NL, 111-19-51.4 WL). The coverage was predicted by Longley-Rice using the software code and input parameters as suggested by OET Bulletin 69. As can be shown, the allotment of KCFM on Channel 229C at Micro’s proposed site will not adequately serve any of Levan with a 70 dBu signal because of the significant terrain barrier that is located between the proposed allotment site and the Community of License. As shown in Figure 8, the intervening terrain is so substantial that even the use of a 600 meter tower does not adequately serve Levan.

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<sup>3</sup> Even though Figure 6 shows that a Loss Area would be created as a result of the deletion of 229C at Richfield, the loss would be short-lived, if at all. Contemporaneous with the filing of this Counterproposal, radio station KLGL 249C Elsinore, UT, is awaiting the grant of a Construction Permit pursuant to FCC 301 Application BPH-20040621AAJ. The facilities specified in that application are identical to the licensed KCYQ 229C Richfield facilities. Therefore, once the KLGL Construction Permit is granted and the facility is built, no loss area will be created upon the exit of KCYQ from Richfield.

Exhibit E, Figure 9 shows the "Gain Area" produced when KCFM moves its allotment site to the coordinates the Commission proposed in its Notice of Proposed Rule Making (39-33-31 NL, 111-51-40 WL). As can be shown, the allotment of KCFM on Channel 229C at the Commission's proposed site will:

- Provide Second Aural Service to 1,950 people (eliminating Grey Area under Priority 2)
- Provide Service to 395,321 people

Exhibit E, Figure 10 shows the "Loss Area" when KCFM 244C vacates its licensed site and current allotment coordinates. As can be shown, the deletion of channel 244C at the current KCFM site will:

- Remove First Aural Service from 0 people (creating White Area under Priority 1)<sup>4</sup>
- Remove Second Aural Service from 292 people (creating Grey Area under Priority 2)
- Remove Service from 142,837 people

### **Conclusions:**

Adoption of the instant Counterproposal will result in a preferential arrangement of Allotments under Priority One, Two, and Three:<sup>5</sup>

**Satisfaction of Priority 1:** More white area is eliminated by the Instant Counterproposal than by Micro's Proposal at the Commission's designated reference coordinates. White area is eliminated to a net 763 people under the instant Counterproposal in comparison to Micro's proposal which does not eliminate any white area.

**Satisfaction of Priority 2:** More grey area is eliminated by the Instant Counterproposal than by Micro's Proposal at the Commission's designated reference coordinates. Grey area is eliminated to a net 2,735 people under the instant Counterproposal in comparison to Micro's proposal which eliminates grey area to only a net 1,658 people.

**Satisfaction of Priority 3:** If the Instant Counter Proposal is adopted, Mount Pleasant, Utah, an incorporated city with a population of 2707, and Boulder Town, UT, an incorporated town of 180, will each receive their first local aural service. Meanwhile, Richfield, UT, will continue to be well served by the remaining fulltime service of KSVC (AM) Richfield, UT. It should also be noted that an additional AM service has also been proposed at Richfield in the recent AM Major Change Window by Better Life Ministries. In total, under the instant Counterproposal, two communities with a combined population of 2,887 will receive first local aural service. Under Micro's Proposal, no new communities will receive first local aural service.

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<sup>4</sup> Although removal of KCFM from its licensed site will create white area where no people reside, it should be noted that this White Area is created over an extremely isolated area of Utah which Interstate 70 traverses. Therefore, even though no people live in the white area, thousands travel through it everyday. Mid-Utah contends that removal of the only station serving this area would not be in the public interest.

<sup>5</sup> Mid-Utah's instant Counterproposal satisfies Priorities One, Two, and Three under the Commission's assignment priorities. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 91-2 (1982).

**Net Gain in Coverage:** Finally, the instant Counterproposal increases the net number of people receiving new service in comparison to Micro's Proposal. Micro's Proposal, at the reference coordinates designated by the Commission, will increase the coverage of KCFM by 252,484 people. The instant Counterproposal, at the reference coordinates specified herein will increase the coverage of KCYQ by 332,453 people.

**Proposed changes to the Table of Allotments are as follows:**

<b><u>Community</u></b>	<b><u>Current</u></b>	<b><u>Proposed</u></b>
Richfield, UT	229C, 980 AM	980 AM
Boulder Town, UT	-----	231C
Mount Pleasant, UT	-----	229C
Levan, UT	244C	244C

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Kevin Terry', written in a cursive style.

Kevin Terry, Consulting Engineer



ENGINEERING STATEMENT  
IN SUPPORT OF A  
COUNTERPROPOSAL  
MB DOCKET 04-258  
RM 1100

Mid-Utah Radio, Inc.

Allocation Study - Channel 231C Boulder Town, UT

Using City Reference of Boulder Town as Reference Coordinates

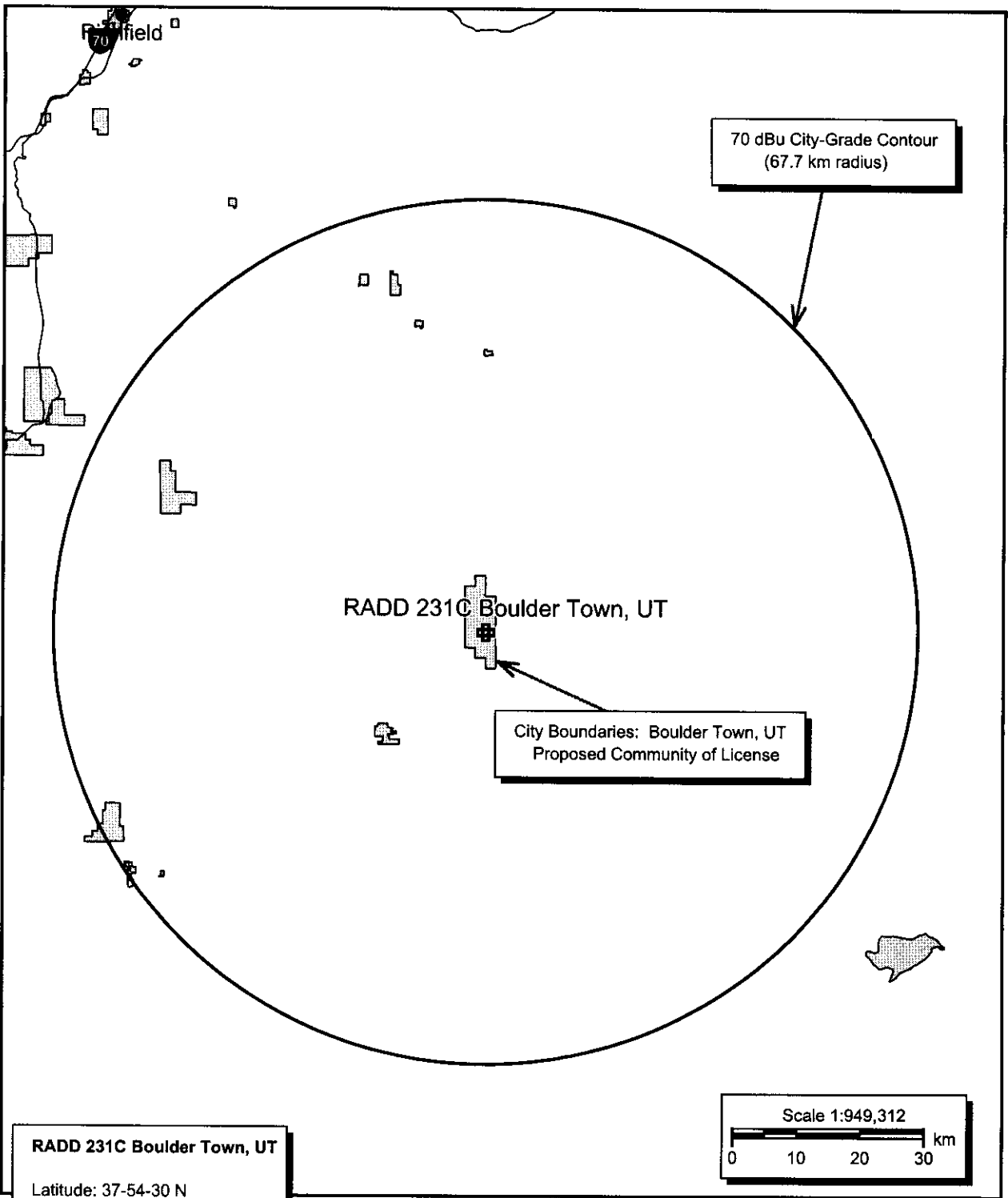
Proposed addition of 231C Boulder Town, UT  
Allotment Site

REFERENCE								DISPLAY DATES
37 54 30 N				CLASS = C				DATA 09-12-04
111 25 20 W				Current Spacings				SEARCH 09-13-04
----- Channel 231 - 94.1 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
KCYQ	LIC 229C	Richfield	UT	89.70	321.9	105.0	-15.30	
Of Concern: KCYQ shall move its site and change Community of License to Mount Pleasant, UT, in this instant Counter Proposal.								
AL233	VAC 233C	Salina	UT	113.71	340.6	105.0	8.71	
KODJ	LIC 231C	Salt Lake City	UT	306.26	348.2	290.0	16.26	
KKXK	LIC 231C	Montrose	CO	335.08	80.6	290.0	45.08	
RDEL	DEL 229C	Richfield	UT	159.75	349.2	105.0	54.75	
KCYQ.C	CP 229C	Richfield	UT	159.75	349.2	105.0	54.75	
RADD	ADD 232C1	Caliente	NV	274.32	264.1	209.0	65.32	
-----								

Mid-Utah Radio, Inc.  
KCYQ (FM) 229C Richfield, UT

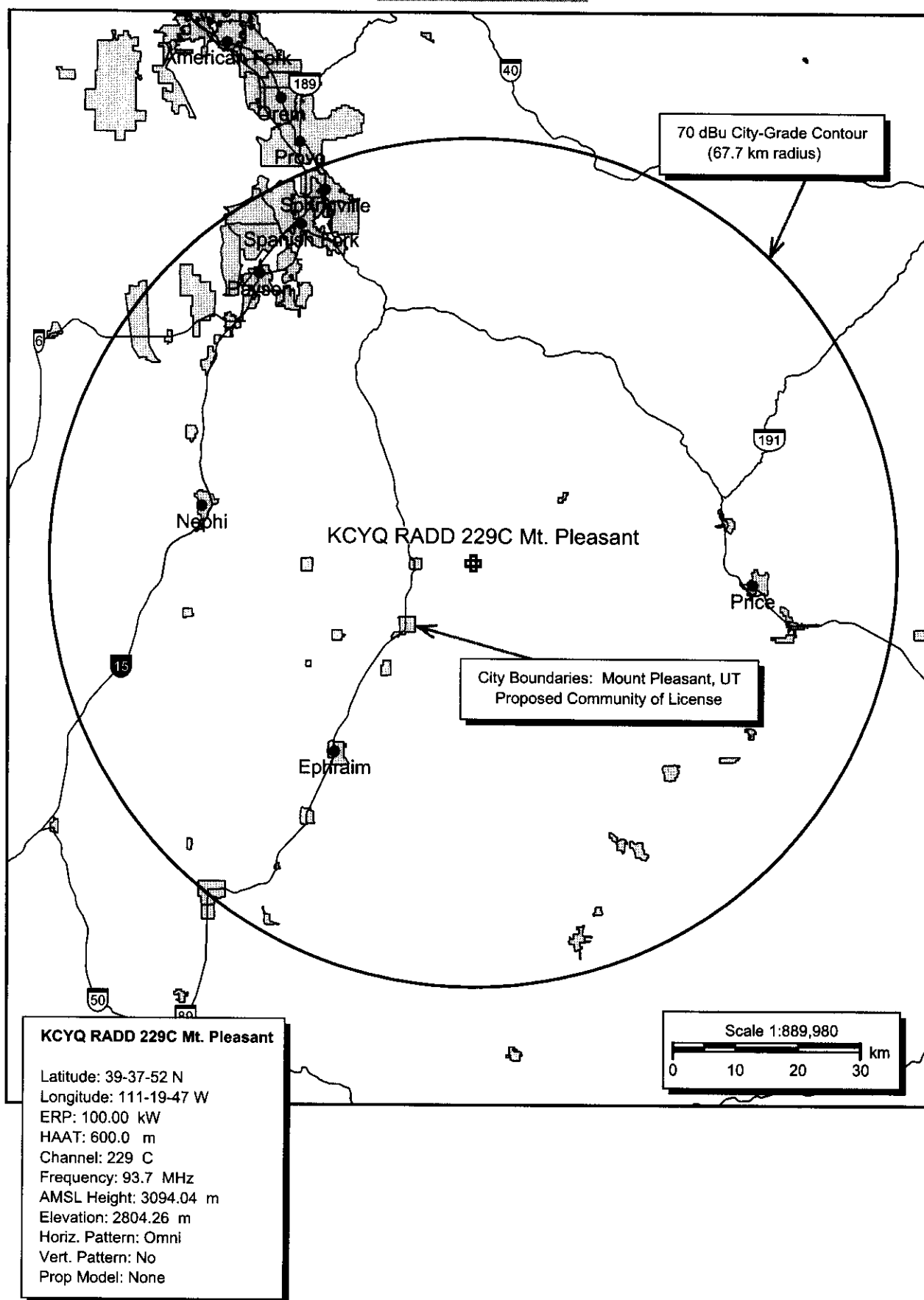
Call	Channel	Location	Dist	Azi	FCC	Margin	
KCYQ	ADD 229C	Mount Pleasant	UT	0.00	0.0	270.0	-270.00
	Reference Coordinates: 39-37-52 NL 111-19-47 WL						
RADD	ADD 229C	Levan	UT	24.11	359.8	270.0	-245.89
	Of Concern: <u>Present NPRM and instant Counterproposal MX Point.</u>						
KCYQ.C	CP 229C	Richfield	UT	51.14	227.8	270.0	-218.86
RDEL	DEL 229C	Richfield	UT	51.14	227.8	270.0	-218.86
	Of no concern: Present Construction Permit site of KCYQ						
KCYQ	LIC 229C	Richfield	UT	136.39	207.7	270.0	-133.61
	Of no concern: Mutually Exclusive Licensed site of KCYQ						
KODJ	LIC 231C	Salt Lake City	UT	129.51	327.1	105.0	24.51
KUBLFM	LIC 227C	Salt Lake City	UT	136.21	327.3	105.0	31.21
RADD	ADD 228A	Manila	UT	203.42	41.6	133.0	70.42

COMMUNITY OF LICENSE



**RADD 231C Boulder Town, UT**

Latitude: 37-54-30 N  
Longitude: 111-25-20 W  
ERP: 100.00 kW  
HAAT: 600.0 m  
Channel: 231 C  
Frequency: 94.1 MHz  
AMSL Height: 2721.29 m  
Elevation: 2032.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None



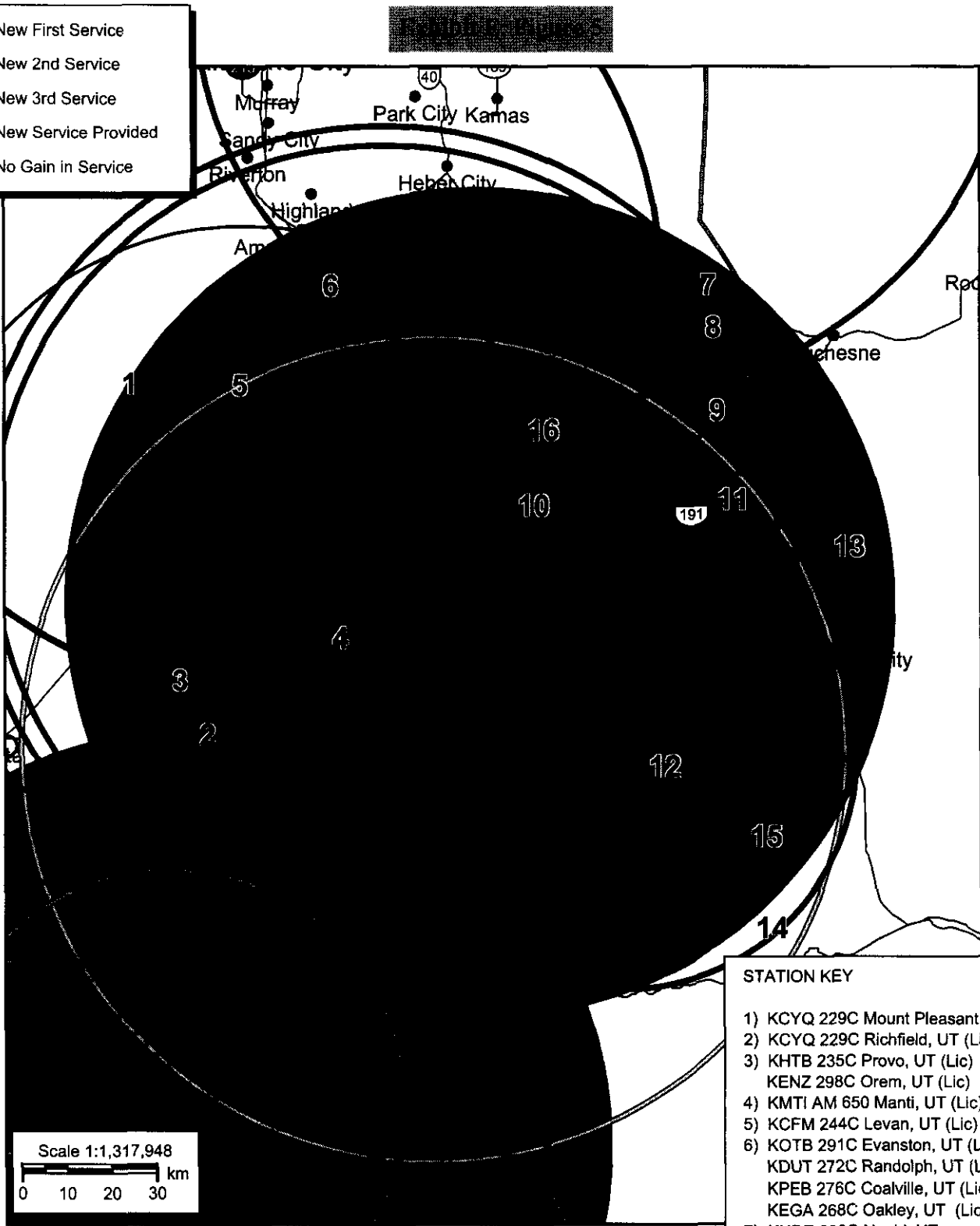
New First Service

New 2nd Service

New 3rd Service

New Service Provided

No Gain in Service



**KCYQ RADD Proposed**  
Mount Pleasant, UT  
Latitude: 39-37-52 N  
Longitude: 111-19-47 W  
ERP: 100.00 kW  
HAAT: 600.22 m  
Channel: 229 C  
Frequency: 93.7 MHz

Service Count Population Report - KCYQ Gain Area Study			
Population Database: 2000 US Census (SF1)			
	Service Pop	Running Total	%
1st Service	12	12	0.0
2nd Service	1,270	1,282	0.3
3rd Service	312	1,594	0.4
4+ Services	374,943	376,537	100.0

- STATION KEY
- 1) KCYQ 229C Mount Pleasant (RADD)

2) KCYQ 229C Richfield, UT (Lic)

3) KHTB 235C Provo, UT (Lic)  
KENZ 298C Orem, UT (Lic)

4) KMTI AM 650 Manti, UT (Lic)

5) KCFM 244C Levan, UT (Lic)

6) KOTB 291C Evanston, UT (Lic)  
KDUT 272C Randolph, UT (Lic)  
KPEB 276C Coalville, UT (Lic)  
KEGA 268C Oakley, UT (Lic)

7) KUDE 280C Nephi, UT

8) KNJQ 286C Manti, UT

9) KSL 1160 (Class A) Salt Lake City

10) KOAL 750 AM Price, UT

11) KARB 252A Price, UT

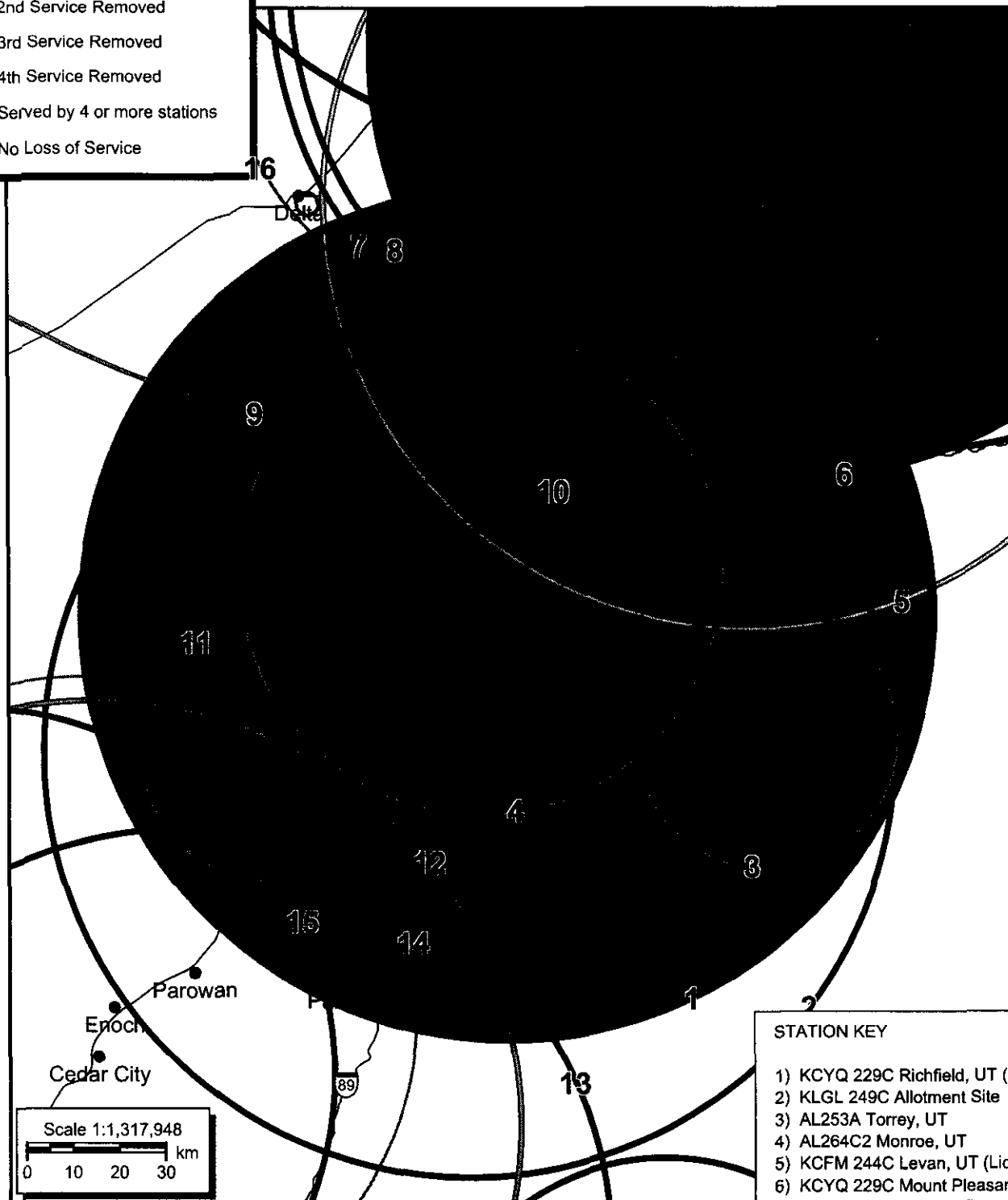
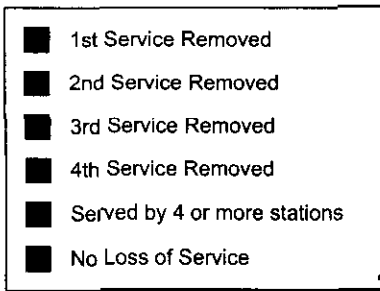
12) KWSA 260A Price, UT

13) AL237C3 Wellington, UT

14) AL296C2 Huntington, UT

15) AL271C3 Castle Dale, UT

16) KMGR 240C1 Delta, UT



#### KCFM RADD

Latitude: 39-50-54 N  
 Longitude: 111-19-51 W  
 ERP: 100.00 kW  
 HAAT: 600.58 m  
 Channel: 229 C  
 Frequency: 93.7 MHz

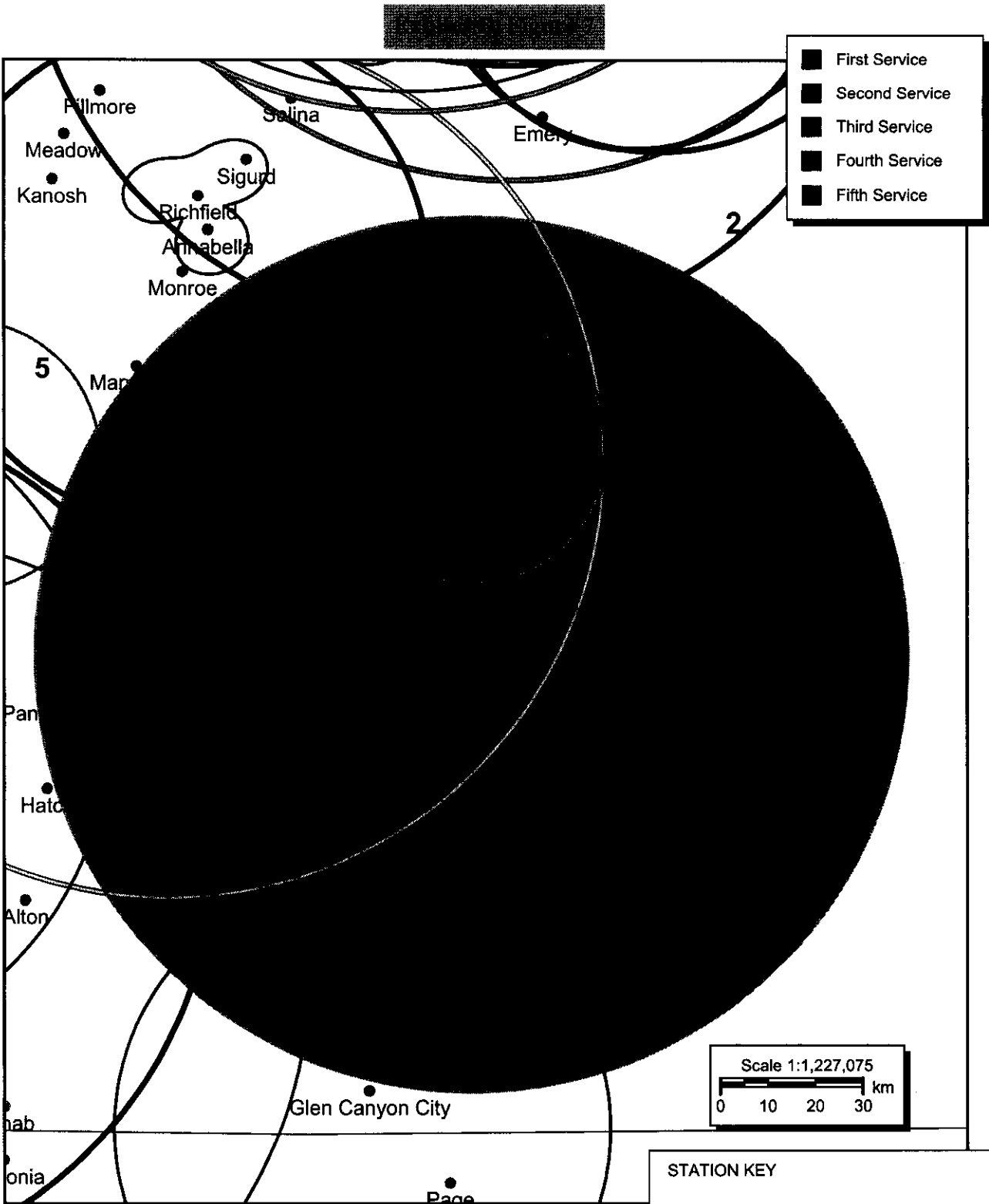
#### Service Count Population Report - KCFM Loss Study

Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
Removing 1st Service	4	4	0.0
Removing 2nd Service	555	559	1.3
Removing 3rd Service	10,399	10,958	24.9
Removing 4th Service	5,605	16,563	37.6
Served by 4+ Services	27,521	44,084	100.0

#### STATION KEY

- 1) KCFM 229C Richfield, UT (Lic)
- 2) KLGL 249C Allotment Site
- 3) AL253A Torrey, UT
- 4) AL264C2 Monroe, UT
- 5) KCFM 244C Levan, UT (Lic)
- 6) KCFM 229C Mount Pleasant (RADD)
- 7) KUDE 280C Nephi, UT
- 8) KNJQ 286C Manti, UT
- 9) KSL 1160 (Class A) Salt Lake City
- 10) KSLV 980 Richfield, UT
- 11) AL259 Beaver, UT
- 12) KREC 251C Brian Head, UT
- 13) KPLD 266C Kanab, UT
- 14) KXBN 235C1 Cedar City, UT
- 15) KXFF 223C Cedar City, UT
- 16) KMGR 240C1 Delta, UT



#### RADD Boulder Town

Latitude: 37-54-30 N  
 Longitude: 111-25-20 W  
 ERP: 100.00 kW  
 HAAT: 600 m  
 Channel: 231 C  
 Frequency: 94.1 MHz

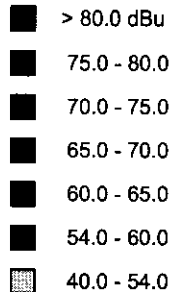
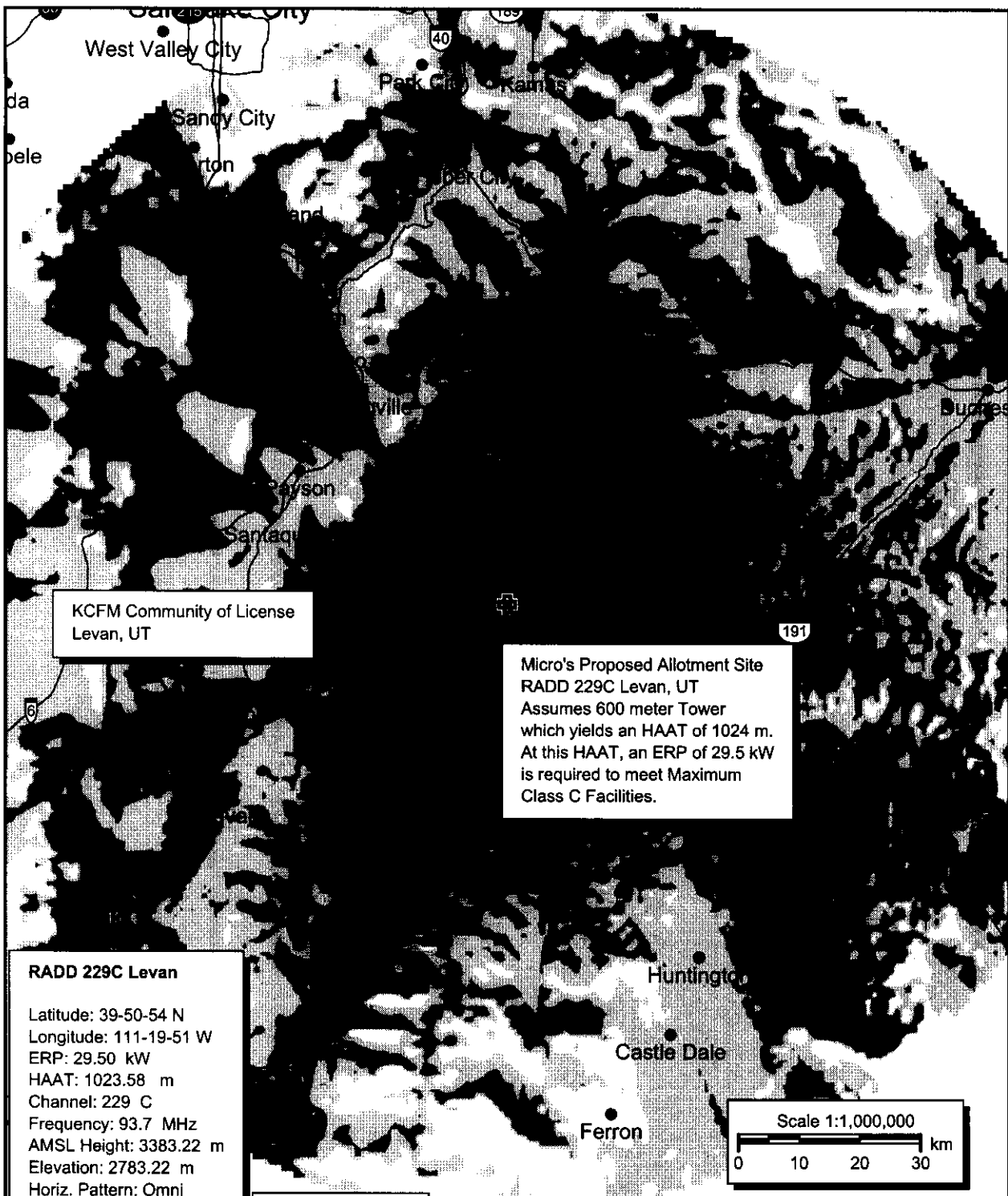
#### Service Count Population Report

Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
1st Service	755	755	8.7
2nd Service	1,465	2,220	25.4
3rd Service	2,817	5,037	57.7
4th Service	1,731	6,768	77.6
5th Service (or >)	1,956	8,724	100.0

#### STATION KEY

- 1) Instantly Proposed 231C Boulder Town, UT
- 2) Current Licensed Site of KCFM 244C Levan
- 3) Vacant Allotment 253A Torrey, UT
- 4) Vacant Allotment 264C2 Monroe, UT
- 5) Vacant Allotment 259A Beaver, UT
- 6) KREC 251C Brian Head, UT
- 7) KXBN 235C1 Cedar City, UT
- 8) KPLD 266C Kanab, UT
- 9) KXAZ 227C2 Page, AZ
- 10) Allotment Site KLGL 249C Elsinore, UT

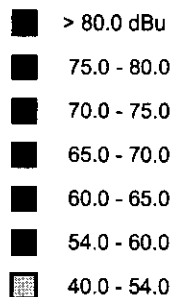


Predicted Coverage Less than 60 dBu  
throughout 100% of Levan, UT from Proposed Site.  
(Assumes a 600 meter tower at Allotment Site.)

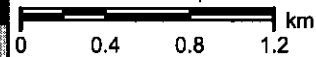
KCFM Community of License  
City Boundaries: Levan, UT

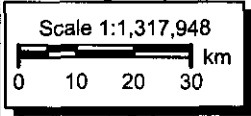
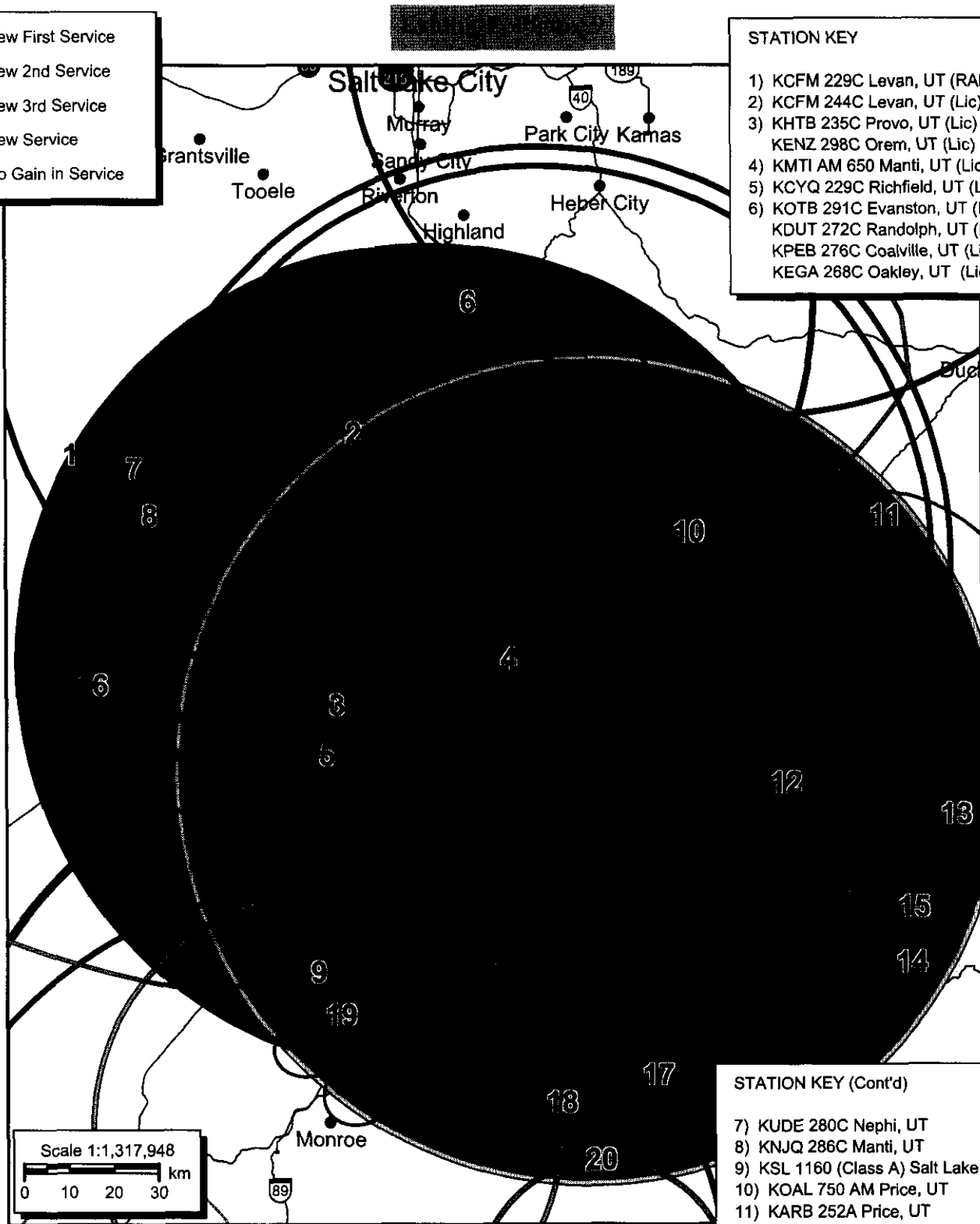
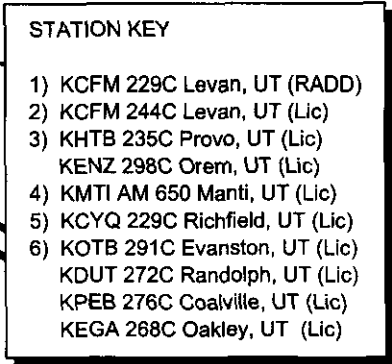
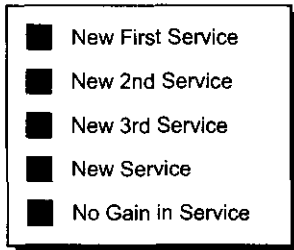
**RADD 229C Levan**

Latitude: 39-50-54 N  
Longitude: 111-19-51 W  
ERP: 29.50 kW  
HAAT: 1023.58 m  
Channel: 229 C  
Frequency: 93.7 MHz  
AMSL Height: 3383.22 m  
Elevation: 2783.22 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: Longley/Rice  
Climate: Cont temperate  
Conductivity: 0.0050  
Dielec Const: 15.0  
Refractivity: 311.0  
Receiver Ht AG: 9.1 m  
Receiver Gain: 0 dB  
Time Variability: 50.0%  
Sit. Variability: 50.0%  
ITM Mode: Broadcast



Scale 1:35,897





**KCFM RADD**  
 City Reference at Levan, UT  
 Latitude: 39-33-31 N  
 Longitude: 111-51-40 W  
 ERP: 100.00 kW  
 HAAT: 289.67 m  
 Channel: 229 C  
 Frequency: 93.7 MHz

Service Count Population Report - KCFM Gain Area Study  
Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
New 1st Service	0	0	0.0
New 2nd Service	292	292	0.2
New 3rd Service	258	550	0.4
New Service	142,837	143,387	100.0

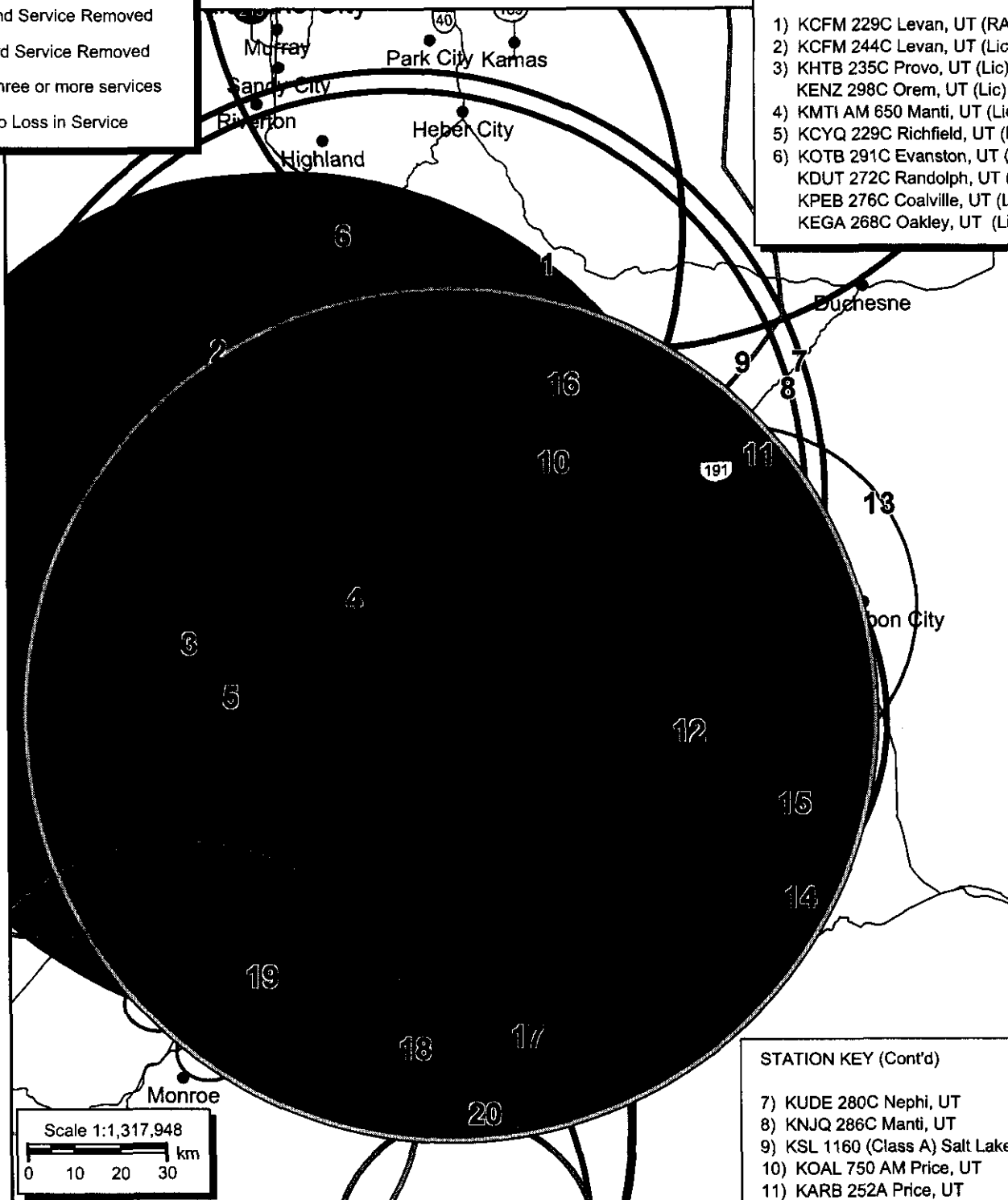
**STATION KEY (Cont'd)**

- 7) KUDE 280C Nephi, UT
- 8) KNJQ 286C Manti, UT
- 9) KSL 1160 (Class A) Salt Lake City
- 10) KOAL 750 AM Price, UT
- 11) KARB 252A Price, UT
- 12) KWSA 260A Price, UT
- 13) AL237C3 Wellington, UT
- 14) AL296C2 Huntington, UT
- 15) AL271C3 Castle Dale, UT
- 16) KMGR 240C1 Delta, UT
- 17) KLGL 249C Elsinore, UT
- 18) AL264C2 Monroe, UT
- 19) KSVC 980AM Richfield, UT
- 20) AL253A Torrey, UT

- First Service Removed
- 2nd Service Removed
- 3rd Service Removed
- Three or more services
- No Loss in Service

# STATION KEY

- 1) KCFM 229C Levan, UT (RADD)
- 2) KCFM 244C Levan, UT (Lic)
- 3) KHTB 235C Provo, UT (Lic)  
KENZ 298C Orem, UT (Lic)
- 4) KMT1 AM 650 Manti, UT (Lic)
- 5) KCYQ 229C Richfield, UT (Lic)
- 6) KOTB 291C Evanston, UT (Lic)  
KDUT 272C Randolph, UT (Lic)  
KPEB 276C Coalville, UT (Lic)  
KEGA 268C Oakley, UT (Lic)



# STATION KEY (Cont'd)

- 7) KUDE 280C Nephi, UT
- 8) KNJQ 286C Manti, UT
- 9) KSL 1160 (Class A) Salt Lake City
- 10) KOAL 750 AM Price, UT
- 11) KARB 252A Price, UT
- 12) KWSA 260A Price, UT
- 13) AL237C3 Wellington, UT
- 14) AL296C2 Huntington, UT
- 15) AL271C3 Castle Dale, UT
- 16) KMGR 240C1 Delta, UT
- 17) KLGL 249C Elsinore, UT
- 18) AL264C2 Monroe, UT
- 19) KSVC 980AM Richfield, UT
- 20) AL253A Torrey, UT

## KCFM

BLH20011105ABA  
Latitude: 39-20-12 N  
Longitude: 111-27-06 W  
ERP: 67.00 kW  
HAAT: 585.0 m  
Channel: 244 C  
Frequency: 96.7 MHz

## Service Count Population Report - KCFM Loss Area Study Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
Loss of 1st Service	0	0	0.0
Loss of 2nd Service	292	292	0.2
Loss of 3rd Service	258	550	0.4
Loss of Service	142,837	143,387	100.0

**CERTIFICATE OF SERVICE**

I, Karen Kelly, hereby certify that on this 13th day of September, 2004, a copy of the foregoing **Comments and Counterproposal of Mid-Utah Radio, Inc.** was sent via hand delivery and e-mail or first class mail and e-mail, as indicated below, to the following:

John A. Karouses, Assistant Chief\*  
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Federal Communications Commission  
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\_\_\_\_\_  
Karen Kelly

\* Delivered by Hand and e-mail

\*\* Delivered by First Class mail and email